

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE:  
CUMMINGS MANOOKIAN, PLLC,  
Debtor.**

**Brian Manookian, Appellant**

**v.**

**Trustee Jeanne Ann Burton, Appellee**

**Case No. 3:21-cv-00797**

**Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair E. Newbern**

**ORAL ARGUMENT REQUESTED**

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**APPELLANT'S UNOPPOSED MOTION TO  
EXTEND REPLY BRIEF DEADLINE**

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Appellant Brian Manookian (“Appellant”) respectfully asks the Court to extend the deadline for his reply brief, which is currently set for January 3, 2022, by two weeks, to January 17, 2022.<sup>1</sup> As grounds for this request, Appellant states that his wife is expecting to deliver a child in the next few days, and Appellant will be busy caring for his wife, their new infant, and their two other children for much of the next two weeks. Additionally, the current deadline falls immediately after the Christmas and New Year’s holidays, during which time counsel for Appellant will be traveling out of state with his own family.

Counsel for Appellant has conferred with Counsel for Appellee Jeanne Ann Burton, who does not oppose this motion.

For the foregoing reasons, Appellant respectfully requests that the Court enter an Order resetting Appellant’s reply deadline to January 17, 2022.

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<sup>1</sup> The docket entry accompanying Appellee’s brief (Dkt. No. 9) states that Appellant’s reply deadline is January 4, 2022, but Appellant calculates his current reply deadline to be January 3, 2022, 14 days after service of Appellee’s brief on December 20, 2021. *See* Fed. R. Bank. P. 8018(a)(3).

Date: December 23, 2021

Respectfully submitted,

/s/ John Spragens

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Appellant's Unopposed Motion to Extend Reply Brief Deadline was filed December 23, 2021 and served electronically upon the following parties in interest as indicated on the receipt issued by the Court's electronic filing system:

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